

## T. A. BLACKBURN LAW

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1242 East 80th Street, 3rd Floor Brooklyn, New York 11236

February 16, 2024

United States District Judge Denise L. Cote Southern District Of New York 500 Pearl Street, Courtroom 18B New York, New York 10007

Re: Zunzurovski v. Fisher et al.; 1:23-cv-10881-DLC

Dear Judge Cote,

My firm represents Aleksandar Zunzurovski ("Mr. Zunzurovski" or "Plaintiff") in the abovereferenced case. I write in response to the Court's order dated 2/15/2024. Before commencing these proceedings, I researched the addresses of all defendants using the Lexis Nexis people search, a program I pay a premium for. My search shows that Defendant Fisher's residence is 225 Broadway Ste 1700, New York, NY 10007-3001. (Attachment A). I researched the NYS Department of State Division of Corporations, and it has Fisher Taubenfeld LLP listed as a Domestic Registered Limited Liability Partnership. The jurisdiction is New York, NOT New Jersey, as the Defendant's counsel intentionally misled the Court to believe. (Attachment B).

Regarding this writer's admission to practice in this Court, I reached out to the Clerk's office and to Pacer and they informed me that I was admitted Pro Hac Vice in 2019. I submitted my application for admission on 10/27/2020 after I was admitted to practice in the EDNY. (Attachment C). My application was submitted through PACER as required by the SDNY attorney admissions application process. It was submitted during the height of the COVID-19 pandemic. Since 10/27/2020, I have filed several cases in this district and have appeared as cocounsel on several others. None of that would have been possible if I was not admitted to practice.

Defendant Counsel intentionally misstated the citizenship of Defendant Fisher and Defendant Fisher Taubenfeld LLP. Defendant's counsel has not provided evidence that the addresses attributed to her clients were inaccurate. Yet, the Court is willing to take her at her word and is eager to sanction this writer and report this writer to the New York State Second Judicial Department Attorney Grievance Committee. I hope the Court is fair and balanced in its threats and sanctions the Defendant's counsel for her intentional misstatements.

Respectfully submitted,

Tyrone A. Blackburn, Cag.
Tyrone A. Blackburn, Egg.

Cc: counsel of record via ECF.





